

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff

v.
LARRY JONES et. al.,
Defendants

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)
)
) No. 20 CR 309-1
) Judge Kendall
)
)

**MOTION FOR MODIFICATION OF BOND REMOVING THE CONDITION OF
HOME CONFINEMENT TO CURFEW AS DIRECTED BY US PRE-TRIAL WITH
ELECTRONIC MONITORING**

Defendant, Larry Jones (“Jones”), by and through his attorney, James D. Tunick, moves this Honorable Court for an order granting Jones a modification of his bond by replacing the condition of home confinement with a curfew as directed by US Pre-trial, along with location monitoring. In support of this motion, Jones proffers to this Court the following:

1. Jones is charged with a conspiracy to distribute a controlled substance, specifically a detectable amount of heroin, in violation of 21 U.S.C §841(a)(1) and 21 U.S.C. § 846. Jones was released on an unsecured bond with home confinement and electronic monitoring, along with a 3rd party custodian.
2. At the time of his arrest, Jones had been working for One City United as a supervisor for a cleaning crew.
3. Prior to the arrest in this case, Jones had not been arrested for any offense for 14 years, when he was arrested for driving on a suspended license. Jones has a prior felony conviction for possession of cocaine in 2002 and a felony conviction for attempted murder in 1997, when Jones was 16 years old.

4. Jones 3rd party custodian is the grandmother of his children. He requests a modification to curfew as directed with location monitoring to expand his work hours and to allow for more time with his children at their residence. There have been no violations while Jones has been on pre-trial release to date.
5. Counsel has communicated with US Pre-trial Officer Bonestroo who has indicated that US Pre-trial does not object to this request. However, the United States Attorneys' office does object to this modification.

Wherefore, Defendant, Larry Jones, respectfully requests that this Honorable Court enter an order modifying the conditions of his bond from home detention to curfew as directed by US Pre-trial Services with location monitoring.

Respectfully submitted,

/s/ James D. Tunick

CERTIFICATE OF SERVICE

I James D. Tunick hereby certify that foregoing **DEFENDANT LARRY JONES MOTION TO MODIFY THE CONDITIONS OF HIS BOND** was served on September 15, 2020 in accordance with Fed.R.Crim.P.49(b), Fed.R.Civ.P.5(b)(2)(D), LR 5.5, Fed.R.Civ.P.5(e) and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

s/ James D. Tunick

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